

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re: § Chapter 11 (Subchapter V)
FREE SPEECH SYSTEMS LLC, §
Debtor. § Case No. 22-60043

**EMERGENCY MOTION TO DIRECT THE PAYMENT OF ALLOWED
PROFESSIONAL FEES**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing. Represented parties should act through their attorney.

Emergency relief has been requested. The Subchapter V Trustee requests consideration of this Motion at the hearing scheduled in the Alexander E. Jones chapter 7 case on or before September 24, 2024 at 2:00pm.

If the Court considers the motion on an emergency basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the emergency consideration is not warranted, you should file an immediate response.

To Judge Christopher López, United States Bankruptcy Judge:

Melissa Haselden, the former Subchapter V Trustee (“**Haselden**”) for Free Speech Systems LLC (“FSS”), files this Emergency Motion to Direct Payment of Allowed Professional Fees.

1. FSS filed a voluntary petition for relief under Chapter 11 Subchapter V of the Bankruptcy Code on July 29, 2022 [Docket No. 1]. On August 2, 2022, Melissa Haselden was appointed Subchapter V Trustee [Docket No. 22].

2. On June 14, 2024, the Court conducted a joint hearing regarding the future of the bankruptcy cases of FSS and its sole member, Alexander E. Jones (“Jones”). The Court converted

the Jones case to one under chapter 7 of the Bankruptcy Code. Christopher R. Murray (“Murray”) was appointed as the chapter 7 Trustee.

3. The Court determined that the FSS case should be dismissed. However, the Court noted the need to address FSS administrative expenses. The FSS case was dismissed by order entered on June 21, 2024 (the “Dismissal Order”) [Docket No. 956]. The Dismissal Order retained the Court’s exclusive jurisdiction to consider applications for approval of professional fees and expenses and further authorized the CRO to transfer control and signing authority with regards to FSS’ bank accounts to Murray in his capacity as the Jones’ chapter 7 Trustee.

4. The Court approved fee applications for a number of professionals who have not yet been paid the balance of approved compensation. Exhibit A is a *Professional Fee Summary* reflects the professional, the docket number of the order approving compensation and allowed, unpaid fees of each professional to be paid by the estate.

5. Certain professionals requested that Murray make payment of the approved compensation from FSS funds. Murray suggested the professionals obtain entry of an order directing payment of the approved compensation. Therefore, Haselden requests, pursuant to 11 U.S.C. § 105 and in furtherance of the Dismissal Order, that Christopher R. Murray, in his capacity as chapter 7 Trustee of the Alexander E. Jones estate, be directed to pay from FSS funds, the respective allowed professional fees in the remaining balances owed as reflected in Exhibit A to this Motion and the Order.

6. A hearing is set on the Trustee's Motion for Entry of an Order Authorizing the Winddown of Free Speech Systems, LLC (the “Wind Down Motion”), [Docket #829], on September 24, 2024 at 2:00pm. Additionally, a status conference on the Wind Down Motion is scheduled for September 11, 2024 at 11am. Haselden requests that to the extent the Court wishes

to set a hearing on this motion, that it be heard contemporaneously with the Wind Down Motion. Emergency relief (19 days' notice) is appropriate because it maximizes efficiencies, minimizes case expenses, without prejudicing parties.

Wherefore, Melissa Haselden requests that the Court enter the Order filed with this motion and grant any further relief that may be appropriate.

DATED: September 4, 2024

Haselden Farrow PLLC

By: /s/ Melissa A. Haselden
Melissa A. Haselden
State Bar No. 00794778
700 Milam, Suite 1300
Pennzoil Place
Houston, Texas 77002
Telephone: (832) 819-1149
Facsimile: (866) 405-6038
Email: mhaselden@haseldenfarrow.com
Former Subchapter V Trustee for Free
Speech Systems, LLC

CERTIFICATE OF SERVICE

I certify that on September 4, 2024, a copy of this Motion was sent to the parties listed below by the Court's ECF notification system, was sent via e-mail to counsel to all parties for PQPR, Alexander Jones, and the Sandy Hook Families. A separate Declaration of Service by US, First Class Mail on the service list will be filed.

/s/ Melissa A. Haselden

Melissa A. Haselden

Unpaid Professional Compensation Summary

<u>Professional</u>	<u>Order Approving</u>	<u>Compensation Docket No.</u>	<u>Allowed, Unpaid Fees</u>
O'Conner Wechsler		1008	\$ 88,384.91
Hap May		977	\$ 50,000.00
Haselden & Farrow		1005	\$ 67,708.98
Jackson Walker LLP		965	\$ 79,349.04
Law Office of Liz Freeman		1010	\$ 76,520.94
M-3 Advisors		964	\$ 60,272.45
Ray Battaglia		913	\$ 3,891.17
			\$ 426,127.49

EXHIBIT**A**